

Mr. Tim Gaffney  
Executive VP Environ. Affairs & Risk Management  
JCI Jones Chemicals, Inc.  
100 Sunny Sol Blvd,  
Caledonia, NY 14423

Subject:  
Process Safety Management Compliance Audit and  
Process Hazard Analysis Revalidation for the  
Merrimack, New Hampshire Facility

Dear Mr. Gaffney:

As retained by JCI Jones Chemicals, ARCADIS U.S., Inc. conducted a third-party review of the Merrimack New Hampshire Facility's Occupational Safety and Health Administration (OSHA) Process Safety Management (PSM) program documentation in anticipation of the facility's triennial compliance audit and 5-year process hazard analysis (PHA) revalidation activities to be conducted by JCI Jones Chemical.

On February 19, 2014, Ms. Lailani Metzler participated in the review of all PSM 14 regulatory elements as part of the compliance audit including the documentation and implementation procedures for the PHA revalidation. Potential program and documentation improvements were discussed during this meeting including the regulatory requirements and the suggested industry standard for retainage of program records for each individual program element. Recommendations were also discussed for the PHA (29 CFR §1910.119(e)) to emphasize the number of safeguards currently in place at the Merrimack Facility and improve the facility siting component of the analysis. In general, we found the facility's PSM program documentation to be in accordance with the requirements of the OSHA PSM regulation.

We thank you for letting us join your team in participating in this critical health and safety task and look forward to collaborating with you again in the future. If you should have any additional questions, please do not hesitate to call me at (914) 641-2640.

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February 20, 2014

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Our ref:  
TL011305.0003

Imagine the result

Sincerely,

ARCADIS-US, Inc.



Lailani Metzler  
Senior Consultant, PSM/RMP Compliance Specialist

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Frank Levin, JCI Chem  
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